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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO VISION**

RICHARD KADREY, et al.,

Individual and Representative Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED RE: MOTION FOR
LEAVE TO FILE THIRD AMENDED
CONSOLIDATED COMPLAINT**

Pursuant to Civil Local Rules 7-11, 79-5(f), and this Court's Standing Order on Motions to Seal, Plaintiffs respectfully submit this Administrative Motion to Consider Whether Another Party's Material Should Be Sealed, filed in connection with Plaintiffs' Motion for Leave to File Third Amended Consolidated Complaint. The Motion contains, in various places, summaries or descriptions of material that Defendant Meta Platforms, Inc. ("Meta"), has designated as "Confidential" or "Highly Confidential - Attorneys Eyes Only," as defined in the parties' Stipulated Protective Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade Secrets (ECF No. 90, the "Protective Order"). Plaintiffs are also filing all exhibits in support of the Motion under seal because they are either designated, or refer to material that is designated, as "Confidential" or "Attorneys' Eyes Only." Finally, Plaintiffs are filing the proposed Third Amended Complaint and redlined Complaint fully under seal because they likely contain a significant amount of information that Meta will move to seal.

Plaintiffs believe most, if not all, of the filed materials should be made publicly available. See Judge Chhabria Standing Order at ¶¶ 28-34. Nevertheless, Plaintiffs are provisionally filing these materials under seal out of an abundance of caution based on Meta's confidentiality designations. Accordingly, Plaintiffs have filed a public version of the Motion for Leave to the docket via ECF, redacting references to such extracted information or summaries. Plaintiffs have also filed under seal an unredacted, highlighted version. Plaintiffs have also filed "slipsheet" versions of the exhibits in support of the Motion for Leave via ECF.

Dated: November 27, 2024

By: /s/ Joshua M. Stein
Joshua M. Stein

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